

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

CIVIL MINUTES - GENERAL

Case No.	CV12-4659 PA (SHx)	Date	May 21, 2013
Title	Paul Grande, et al. v. Fair Collections & Outsourcing, Inc.		

Present: The Honorable	PERCY ANDERSON, UNITED STATES DISTRICT JUDGE
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Paul Songco

Not Reported

N/A

Deputy Clerk

Court Reporter

Tape No.

Attorneys Present for Plaintiffs:

Attorneys Present for Defendants:

None

None

Proceedings: IN CHAMBERS - COURT ORDER

Before the Court is a Motion for Attorneys' Fees and Costs filed by plaintiffs Paul Grande and Zuzanna Grande ("Plaintiffs") (Docket No. 32). Defendant Fair Collections & Outsourcing, Inc. ("Defendant") has filed an Opposition. Pursuant to Rule 78 of the Federal Rules of Civil Procedure and Local Rule 7-15, the Court finds that this matter is appropriate for decision without oral argument. The hearing calendared for April 22, 2013, is vacated, and the matter taken off calendar.

I. Background

This action was commenced in the Los Angeles Superior Court on April 23, 2012, and removed by Defendant on May 29, 2012. Plaintiffs allege the following two causes of action: (1) violations of the Rosenthal Fair Debt Collection Practices Act ("RFDCPA"), Cal. Civ. Code §§ 1788-1788.32; and (2) violations of the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. §§ 1692-1692(p).

Plaintiffs and Defendant each moved for summary judgment in December 2012. The Court denied both parties' Motions for Summary Judgment in an Order dated January 15, 2013. The parties filed a Notice of Settlement on February 1, 2013. Pursuant to the Notice of Settlement, Defendant agreed to pay to each Plaintiff \$3,500.00 for a total of \$7,000.00.

Plaintiffs now move for an award of attorneys' fees and costs. Plaintiffs' Motion for Attorneys' Fees and Costs asserts that the combined lodestar calculation for the efforts of all attorneys is \$84,460.50, based on an hourly rate of \$450.00 for Mr. Kazerounian, \$495.00 for Mr. Swigart, \$495.00 for Mr. Hyde and \$250.00 for Mr. Loker. Plaintiffs also incurred \$1,178.25 in costs and expenses. The parties submitted a Joint Statement re Attorneys' Fees listing the hours sought, a description of the hours, the movant's position, and the respondent's position. Defendant argues that reasonable attorneys' fees in this case should be \$16,193, plus reasonable fees for Plaintiffs' Fee Application, as set forth in the Joint Statement and Memorandum in Opposition.

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II. Attorneys' Fees Standard

The FDCPA and RFDCPA both provide that reasonable attorneys' fees and costs shall be awarded to a prevailing plaintiff. Specifically, 15 U.S.C. § 1692k(a)(3) of the FDCPA states that "any debt collector who fails to comply with any provision of [the FDCPA] with respect to any person is liable to such person. . . [for] the costs of the action, together with a reasonable attorney's fee as determined by the court." The FDCPA's statutory language makes the award of fees mandatory. Camacho v. Bridgeport Financial, Inc., 523 F.3d 973, 978 (9th Cir. 2008). "The reason for mandatory fees is that congress chose a 'private attorney general' approach to assume enforcement of the FDCPA." Id. (quoting Tolentino v. Friedman, 46 F.3d 645, 651 (7th Cir. 1995)); Evon v. Law Offices of Sidney Mickell, 688 F.3d 1015, 1032 (9th Cir. Cal. 2012).

A reasonable attorneys' fee is determined in two steps. First, the Court must determine a reasonable "lodestar" fee by multiplying the number of hours reasonably expended by the attorneys on the litigation by a reasonable hourly rate. Camacho at 978; McElwaine v. US West, Inc., 176 F.3d 1167, 1173 (9th Cir. 1999). A reasonable hourly rate is "'calculated according to the prevailing market rates in the relevant community, regardless of whether plaintiff is represented by private or nonprofit counsel.'" Sorenson v. Mink, 239 F.3d 1140, 1145 (9th Cir. 2001) (quoting Blum v. Stenson, 465 U.S. 886, 895, 104 S. Ct. 1541, 1547, 79 L. Ed. 2d 891 (1984)). The burden is on the plaintiff to produce evidence "that the requested rates are in line with those prevailing in the community for similar services by lawyers of reasonably comparable skill, experience, and reputation." Id. (quoting Blum, 465 U.S. at 895 n.11). Also, in determining the lodestar amount, the burden is on the party seeking fees to submit evidence supporting the hours worked and rates claimed. Van Gerwen v. Guar. Mut. Life. Co., 214 F.3d 1041, 1045 (9th Cir. 2000). The Court "should exclude from the lodestar amount hours that are not reasonably expended because they are 'excessive, redundant, or otherwise unnecessary.'" Id. (quoting Hensley, 461 U.S. at 434). "Where the documentation of hours is inadequate, the district court may reduce the award accordingly." Sorenson v. Mink, 239 F.3d 1140, 1146 (9th Cir. 2001) (internal quotation marks and citation omitted).

Second, the Court determines if the lodestar should be adjusted to accurately reflect a reasonable fee by looking at the factors discussed in Kerr v. Screen Extras Guild, 526 F.2d 67, 70 (9th Cir. 1975). "A trial court has broad discretion to determine the reasonable amount of an attorney fee award, including whether to increase or decrease the lodestar figure." Jadwin v. County of Kern, 767 F. Supp. 2d 1069, 1141 n.80 (E.D. Cal. 2011). "'To the extent a trial court is concerned that a particular award is excessive, it has broad discretion to adjust the fee downward or deny an unreasonable fee altogether.'" Pisotoresi v. Madera Irrigation Dist., 2009 WL 910867, at *6 (E.D. Cal. April 2, 2009) (quoting Ketchum v. Moses, 24 Cal. 4th 1122, 1138, 104 Cal. Rptr. 2d 377, 388 (2001)). Although the court has broad discretion in determining attorneys' fee awards, it must provide "some indication or explanation as to how it arrived at the amount of fees awarded." Fair Hous. of Marin v. Combs, 285 F.3d 899, 907 (9th Cir. 2002).

The twelve Kerr factors bearing on reasonableness are:

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(1) the time and labor required, (2) the novelty and difficulty of the questions involved, (3) the skill requisite to perform the legal service properly, (4) the preclusion of other employment by the attorney due to acceptance of the case, (5) the customary fee, (6) whether the fee is fixed or contingent, (7) time limitations imposed by the client or the circumstances, (8) the amount involved and the results obtained, (9) the experience, reputation, and ability of the attorneys, (10) the ‘undesirability’ of the case, (11) the nature and length of the professional relationship with the client, and (12) awards in similar cases.

Id. “There is a strong presumption that the lodestar figure represents a reasonable fee. ‘Only in rare instances should the lodestar figure be adjusted on the basis of other considerations.’” Morales v. City of San Rafael, 96 F.3d 359, 363 n.8 (9th Cir. 1996) (quoting Harris v. Marhoefer, 24 F.3d 16, 18 (9th Cir. 1994)). “[T]he court need not discuss each factor. It is sufficient if the record shows that the court consider[s] the factors called into question by the case at hand and necessary to support the reasonableness of the fee award.” Sapper v. Lenco Blade, Inc., 704 F.2d 1069, 1073 (9th Cir. 1983) (internal citations and quotation marks omitted).

Some of the Kerr factors are subsumed into the initial lodestar calculation while others are not. “Adjusting the lodestar on the basis of subsumed reasonableness factors after the lodestar has been calculated, instead of adjusting the reasonable hours or reasonable hourly rate at the first step . . . is a disfavored procedure.” Morales, 96 F.3d at 364 n.9. Among the subsumed factors presumably taken into account in either the reasonable hours component or the reasonable rate component of the lodestar calculation are the novelty and complexity of issues, the special skill and experience of counsel, the quality of representation, and the results obtained. Id. (citing Cabrales v. County of Los Angeles, 864 F.2d 1454, 1464 (9th Cir. 1988)).

III. Analysis

To assist the Court’s review of the reasonableness of the requested fees, the Court ordered the parties to prepare a Joint Statement detailing the tasks completed by Plaintiffs’ attorneys and paralegals, the amount of time Plaintiffs seek for each of those tasks, any reduction to those hours proposed by Defendant, and the parties’ rationale in support of any disputed items.

A. Reasonable Hours Expended

The Court has examined the disputed hours detailed in the parties’ Joint Statement and the evidence presented by the parties in support and opposition to the Motion for Attorneys’ Fees and Costs. Where appropriate, the Court has reduced or eliminated hours claimed by Plaintiffs. The Court’s reductions to the requested hours are reflected in the “Hours Awarded by Court” column of the Joint Statement, which is attached to this Order as Exhibit A.

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Plaintiffs' Motion asserts that they have logged 242.5 hours in this case. Defendant challenges the accuracy and reasonableness of the hours submitted by Plaintiffs. Given the nature of the case and the descriptions in the Joint Statement, the Court finds that the reasonableness of the hours requested by Plaintiffs is not supported by the evidence. Here, the case did not contain the complexity of legal issues and the breadth of factual evidence to support the reasonableness of four attorneys, three of whom are partners, from two different law firms. Further, the number of hours requested is excessive. In this particular case, there was limited discovery, hearings and motions. The Court has therefore made reductions in the number of hours requested by Plaintiffs' counsel.

Where the Court has made reductions, it has done so for the reasons stated in the "Reasons for Reduction" column. The Court's reductions were made for the following reasons: lack of sufficient detail in the description; an excessive amount of time spent on the task; billing attorney time for nonbillable clerical and administrative tasks; and an overall excessive amount of time billed given the relative lack of complexity of the action, and the comparatively small amount of substantive work performed in the time the case was actively litigated.

As a result of its review, the Court has made the following modifications to the hours requested by Plaintiffs: (1) the 75.2 hours for Abbas Kazerounian have been reduced to 54.8 hours; (2) the 29.5 hours for Joshua B. Swigart have been reduced to 0 hours; (3) the 6.4 hours for Robert Hyde have been reduced to 0 hours; and (4) the 131.4 hours for Matthew M. Loker have been reduced to 95.1 hours.

B. Reasonable Hourly Rates

Plaintiffs argue that reasonable hourly rates are \$450.00 for Mr. Kazerounian, \$495.00 for Mr. Swigart, \$495.00 for Mr. Hyde and \$250.00 for Mr. Loker. The Declarations of Stephen G. Recordon and Clinton Rooney^{1/}, submitted by Plaintiffs, state that these are reasonable rates for partners of their experience. However, the declarations state that these are rates for complex litigation, whereas this case involved the single issue of whether there had been a violation of the FDCPA and RFDCPA and was not a complex class action or complex commercial litigation. Defendant's Opposition provides that the reasonable rate is \$300 per hour for Mr. Kazerounian, Mr. Swigart, and Mr. Hyde, and \$185 per hour for Mr. Loker. See Declarations of June Coleman and Tomio Narita.^{2/} A district court should calculate the

^{1/} Defendant filed objections to the Declarations of Stephen G. Recordon and Clinton Rooney. Defendant argues that these declarations are irrelevant to the determination of a reasonable hourly rate, because each declaration only opines on rates for complex litigation, and therefore is not probative of the reasonable hourly rate for a simple, single-issue FDCPA case. The Court overrules the objections as they are not necessarily evidentiary objections regarding the admissibility of the evidence. The Court agrees that the declarations are not sufficient to establish the reasonable hourly rate in this case.

^{2/} Plaintiffs filed objections to the Declarations of June Coleman and Tomio Narita. Plaintiffs argue that the rates proposed in these declarations are irrelevant, because they are fellow defense attorneys and reference the hourly rate they would charge their own clients. However, these declarations

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reasonable hourly rate according to the prevailing market rates in the relevant community. See Blum at 895.

Plaintiffs do not provide much evidence for the requested rate of \$250 per hour for Mr. Loker. It appears from the evidence submitted that Mr. Loker became a member of the bar approximately four months before the Complaint in the present matter was filed. Based on the rates prevailing in the community for similar services by lawyers of reasonably comparable skill, experience, and reputation, the Court concludes that a rate of \$250 per hour is not a reasonable hourly rate for Mr. Loker.

To support the rates sought, Plaintiffs argue that the FDCPA is a complex statutory scheme. While cases involving the FDCPA may be complex, this action was not. Here, the creditor acknowledged it had miscalculated the amount of the debt owed, which resulted in an automatic FDCPA violation. The only issue in this case was whether Defendant could establish a bona fide error. Plaintiffs cite Bellows v. NCO Financial Systems, Inc., 07-CV-1413 W (AJB), 2009 WL 35468 (S.D. Cal. Jan. 5, 2009), and Sarabi, et al. v. Weltman, Weinberg & Reis Co., L.P.A., 10-cv-1777 AJB (NLS), among other cases, in support of the rates of \$450 and \$495 per hour. However, both of these cases were putative class actions and more complex cases from the Southern District of California. The Court does not find these cases very persuasive because the rates do not appear to be based on similar services and recent cases in the Central District of California have awarded fees below those amounts.

Plaintiffs further cite that in Camacho, where an attorney's fee award in a FDCPA case was vacated because the district court failed to make findings regarding what constituted the relevant community or an appropriate market rate, the Ninth Circuit reiterated that "[i]n order to encourage able counsel to undertake FDCPA cases, as congress intended, it is necessary that counsel be awarded fees commensurate with those which they could obtain by taking other types of cases." Camacho at 981 (internal quotation marks omitted and alteration in original). The Court has considered the cases submitted by Plaintiffs regarding fees awarded in other types of cases, as well as the other evidence submitted by Plaintiffs and Defendant regarding the prevailing market rates in the relevant community.

Additionally, recent cases in the Central District of California provide some indication of the prevailing market rates in the relevant community. See Rubenstein v. Nat'l Recovery Agency, Inc., 2012 U.S. Dist. LEXIS 87941 (C.D. Cal. Apr. 25, 2012) (finding that \$275.00 is a reasonable hourly rate in a case involving FDCPA claims); Yepremyan v. GC Servs. LP, 2013 U.S. Dist. LEXIS 13516, 4-5 (C.D. Cal. Jan. 18, 2013) (approving billing rate of \$240 per hour and \$335 per hour); McClenning v. NCO Fin. Sys., No. 10-CV-3631 (CAS) (RZx), 2011 U.S. Dist. LEXIS 41334, at *8 (C.D. Cal. Apr. 11, 2011) (finding that the requested \$285.00 hourly rate was reasonable for attorneys with 10 and 12 years of experience in FDCPA cases); Montoya v. Creditors Interchange Receivable Mgmt., LLC, No. CV

provide information regarding each of Plaintiffs' attorneys in this case specifically. The declarations are based on the level of experience of Plaintiffs' attorneys, a review of the pleadings in this case, and the average market rates for cases of similar complexity in the Central District of California. Plaintiffs' objections are overruled.

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10-3037 (PSG) (Ex), 2011 U.S. Dist. LEXIS 64611 (C.D. Cal. June 17, 2011) (awarding \$275.00 per hour).

Considering all of the factors and looking at the rates prevailing in the community for similar services by lawyers of reasonably comparable skill and experience, the Court finds that the rates of \$300 per hour and \$185 per hour are reasonable. Therefore, the Court adopts the rates established by Defendant.

C. Reasonable Costs

Additionally, Plaintiffs seek \$1,178.25 in costs and expenses. The Court's February 12, 2013 Order setting the briefing schedule for Plaintiffs' Motion for Attorneys' Fees stated that a separate spreadsheet or table shall be prepared for any non-taxable costs. Plaintiffs have not filed a separate spreadsheet or table for non-taxable costs. Further, when the Court ordered the parties to prepare a Joint Statement detailing the non-taxable costs, it did not relieve Plaintiffs of the requirements of Local Rule 54-3, which requires the prevailing party to file a Notice of Application to the Clerk to Tax Costs and lodge a Bill of Costs.

Pursuant to Local Rule 54-3, at least in the first instance, it is for the Clerk, and not the Court, to determine the award of taxable costs. The Court has discretion to deny Plaintiffs' request for taxable costs based on Plaintiffs' failure to comply with the Local Rules. See Lytle v. Carl, 382 F.3d 978, 989 (9th Cir. 2004) (affirming a district court's refusal to award taxable costs for failure to comply with a local rule). Accordingly, the Court declines to award taxable costs.

Plaintiffs detailed their costs in the parties' Joint Statement. However, they did not indicate whether the amounts they seek are taxable or non-taxable costs. Litigation expenses, such as duplication costs, transcripts, survey expenses, and expert fees, are not taxable under Central District Local Rule 54-4, but are recoverable as "reasonable attorneys' fees" if the prevailing practice in the local community is separate billing for such expenses. See Trs. of the Constr. Indus. & Laborers Health & Welfare Trust v. Redland Ins. Co., 460 F.3d 1253, 1258 (9th Cir. 2006). The costs sought by Plaintiffs appear to be mainly for internal office printing. Plaintiffs have failed to submit any evidence that the prevailing practice in the local community is separate billing for such expenses. Therefore, Plaintiffs' Motion for Attorneys' Fees and Costs is denied as to costs.

Conclusion

For all of the foregoing reasons, the Court grants in part Plaintiffs' Motion for Attorneys' Fees and Costs and awards attorneys' fees in the total amount of \$34,033.50 (\$17,593.50 for 95.1 hours at \$185/hour for work performed by Mr. Loker; \$16,440 for 54.8 hours at \$300/hour for work performed by Mr. Kazerounian). The Court denies Plaintiffs' Motion with respect to costs.

IT IS SO ORDERED.

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
3/22/2012	AK	Discussed potential case with ML and JBS	0.8	0	0.8	N/A
3/27/2012	AK	Printing Cost - \$11.70		\$11.70		
3/28/2012	AK	Discussed documents with ML	0.9	0	0	Entry lacks sufficient detail to determine reasonableness
3/29/2012	AK	Saved executed Retainer	0.1	0	0	Clerical or administrative task
3/30/2012	AK	Printing Cost for Complaint – \$2.40		\$2.40		
3/30/2012	AK	Reviewed Complaint and sent minor notes to ML	0.7	0.4	0.4	Excessive
3/30/2012	AK	Sent Complaint to JBS to review	0.1	0	0	Duplicative or unnecessary
4/2/2012	AK	Reviewed final draft	0.4	0	0.4	N/A
4/2/2012	AK	Sent Complaint to process server to be filed and served	0.3	0	0	Clerical or administrative task
5/12/2012	AK	Printed BBB Responses - \$4.20		\$4.20		
5/15/2012	AK	Discussed BBB response with ML	0.3	0	0.3	N/A
5/29/2012	AK	Received notice that FCO removed case to Central District	0.1	0.1	0.1	n/A
5/29/2012	AK	Sent removal notice to ML and JBS	0.2	0	0.2	N/A
5/30/2012	AK	Discussed response with ML	0.2	0	0.2	N/A
5/30/2012	AK	Reviewed FCO's Answer	0.2	0.2	0.2	N/A
5/31/2012	AK	Received/reviewed Standing Order – sent to ML and JBS	0.4	0.4	0.4	N/A
5/31/2012	AK	Received/reviewed Scheduling Meeting of Counsel – sent to ML and JBS	0.3	0	0.3	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
6/1/2012	AK	Discussed Standing Order and Scheduling Meeting of Counsel with ML	0.4	0	0.2	Excessive
6/18/2012	AK	Discussed FCO's position with ML, JBS and BH	0.3	0	0.3	N/A
6/29/2012	AK	Printed 26f - \$2.40		\$2.40		
6/29/2012	AK	Reviewed 26f – sent notes to ML	0.4	0.4	0.4	N/A
7/6/2012	AK	Reviewed 26f – approved for filing	0.3	0.3	0.3	N/A
7/20/2012	AK	Received Order re 26f	0.1	0.1	0.1	N/A
7/20/2012	AK	Reviewed 26f and forwarded to ML and JBS	0.5	0.5	0.5	N/A
7/20/2012	AK	Received Civil Trial Order and Scheduling Order	0.1	0.1	0.1	N/A
7/20/2012	AK	Sent Civil Trial Order and Scheduling Order to ML and JBS	0.1	0	0.1	N/A
7/23/2012	AK	Printed 26as - \$1.20		\$1.20		
7/23/2012	AK	Reviewed 26as	0.5	0.2	0.5	N/A
7/23/2012	AK	Sent notes to ML re 26as	0.1	0	0.1	N/A
7/23/2012	AK	Printed 26as with AK notes - \$1.20				
9/12/2012	AK	Discussed settlement numbers with ML	0.4	0	0.4	N/A
10/5/2012	AK	Discussed litigation strategy with JBS and ML	1.3	0	0.8	Excessive
10/7/2012	AK	Printed discovery - \$4.50		\$4.50		

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
10/7/2012	AK	Reviewed discovery and made changes	0.6	0.6	0.6	N/A
11/19/2012	AK	Discussed extension with ML	0.2	0	0.2	N/A
12/3/2012	AK	Discussed discovery with ML	0.5	0	0.5	N/A
12/6/2012	AK	Discussed filing MSJ with ML and JBS	1.4	0	1	Excessive
12/7/2012	AK	Began research for MSJ	1.4	0	1.4	N/A
12/11/2012	AK	Drafted MSJ	3.4	0	3.4	N/A
12/11/2012	AK	Printed our MSJ - \$31.80		\$0		
12/12/2012	AK	Continued work on MSJ	4.5	0	3	Excessive
12/13/2012	AK	Sent MSJ to ML, BH, and JBS to review	0.1	0	0.1	N/A
12/15/2012	AK	Printed their MSJ - \$26.10		\$26.10		
12/15/2012	AK	Researched FCO's MSJ	2.7	0	2.7	N/A
12/15/2012	AK	Discussed Decs for PG and ZG with ML and JBS	0.6	0	0.6	N/A
12/17/2012	AK	Received supplemental RFPs	0.1	0.1	0.1	N/A
12/17/2012	AK	Sent supplemental responses to ML to review	0.1	0	0.1	N/A
12/18/2012	AK	Began Oppo to FCO's MSJ	1.1	1.1	1.1	N/A
12/18/2012	AK	Printed our Oppo - \$11.70		\$11.70		
12/20/2012	AK	Printed JBS' notes - \$11.70		\$11.70		
12/20/2012	AK	Continued work on Oppo	5.1	5.1	5.1	N/A
12/22/2012	AK	Discussed FCO's Oppo with ML and JBS	0.5	0	0.5	N/A
12/22/2012	AK	Printed their Oppo - \$23.40		\$0		
12/23/2012	AK	Continued work on our Oppo	2	1	2	N/A
12/23/2012	AK	Continued work on Oppo	1.8	0	1	Excessive
12/23/2012	AK	Printed our Oppo - \$11.70		\$11.70		

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Biller	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
12/24/2012	AK	Sent final Oppo to JBS and BH to review	0.1	0	0	Duplicative or unnecessary
12/24/2012	AK	Filed Oppo to FCO's MSJ	0.7	0	0	Clerical or administrative task
12/26/2012	AK	Printed ML's Reply draft - \$5.10		\$5.10		
12/27/2012	AK	Worked on Reply	1.9	0	1.9	N/A
12/29/2012	AK	Finalized Reply	1.1	0	1.1	N/A
12/29/2012	AK	Sent Reply to ML, JBS and BH to review	0.1	0	0.1	N/A
12/30/2012	AK	Prepared PG and ZG for depo	2.2	0	0	Duplicative or unnecessary
12/31/2012	AK	Filed Reply	0.7	0	0	Clerical or administrative task
1/1/2013	AK	Reviewed FCO's reply	2.7	0	1.5	Excessive
1/1/2013	AK	Printed their Reply - \$8.40		\$8.40		
1/1/2013	AK	Discussed FCO's Reply with ML and JBS	1	0	0.5	Excessive
1/1/2013	AK	Called PG and ZG final depo prep	0.6	0.6	0.6	N/A
1/2/2013	AK	Defended depositions re PG and ZG	8.4	4.1	7	Excessive
1/2/2013	AK	Parking - \$27.50		\$27.50		
1/3/2013	AK	Discussed depositions with JBS and ML	0.4	0	0	Duplicative or unnecessary
1/15/2013	AK	Received Ruling on MSJ	0.1	0.1	0.1	N/A
1/15/2013	AK	Sent ruling to ML, JBS, and AK	0.3	0	0.1	Excessive
1/17/2013	AK	Discussed Order with ML, JBS and AK	0.9	0	0.4	Excessive
1/17/2013	AK	Discussed potential motion reconsideration with PG and ZG	0.6	0	0.1	Excessive
1/20/2013	AK	Discussed pretrial documents with ML and JBS	1.1	0	0.4	Entry lacks sufficient detail to determine reasonableness

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
1/29/2013	AK	Printed pretrial docs - \$28.20		\$28.20		
1/29/2013	AK	Discussed Joint Pretrial docs with ML and JBS	0.8	0	0	Duplicative or unnecessary
1/29/2013	AK	Sent demand to ST and PJ	0.3	0.3	0.3	N/A
1/29/2013	AK	Discussed mediation with ML	0.2	0	0.1	Excessive
1/29/2013	AK	Discussed mediation with ST	0.5	0.5	0.5	N/A
1/29/2013	AK	Reviewed Joint Stip and sent notes to ML	0.3	0	0.3	N/A
1/31/2013	AK	Printed pretrial docs - \$28.20		\$28.20		
1/31/2013	AK	Reviewed and sent notes to ML	1.2	0	1.2	N/A
1/31/2013	AK	Researched FDCPA and bona fide error	2.1	0	0	Duplicative or unnecessary
2/1/2013	AK	Reviewed pretrial docs	0.7	0	0.4	Excessive
2/1/2013	AK	Discussed settlement with ST	0.7	0.7	0.7	N/A
2/1/2013	AK	Requested that ML discuss settlement numbers with PG and ZG	0.2	0	0.1	Excessive
2/4/2013	AK	Discussed Order with ML and JBS	0.4	0	0.2	Excessive
2/8/2013	AK	Received confirmation from ML that PG and ZG would appear at hearing	0.1		0.1	N/A
2/12/2013	AK	Discussed hearing with ML and JBS	0.5	0	0.2	Excessive
2/13/2013	AK	Discussed fee petition with ML and JBS	0.7	0	0.7	N/A
2/18/2013	AK	Gathered costs	2.1	0	0	Clerical or administrative task
3/8/2013	AK	Received a message from PJ requesting a settlement demand	0.1	0.1	0.1	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Biller	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
3/8/2013	AK	Discussed Plaintiffs' counter with ML and JBS	0.2	0	0.2	N/A
3/8/2013	AK	Sent demand to PJ	0.1	0.1	0.1	N/A
3/8/2013	AK	Discussed FCO's position on settlement check with ML and JBS	0.3	0	0.2	Excessive
3/12/2013	AK	Continued work on Fee Petition	1.3	?	1.3	N/A
3/12/2013	AK	Worked on Fee Petition	4.1	Defendant has not yet received Fee Petition	3	Excessive
3/13/2013	AK	Reviewed Joint Statement and sent notes to ML	0.4	0	0.4	N/A
12/27/2012	AK	Discussed Reply with ML and JBS	0.8	0	0.4	Excessive
					54.8	
				54.8 hrs * \$300/hr	\$16,440.00	
6/18/2012	BH	Discussed FCO's position with ML, AK, and JBS	0.3	0	0	Duplicative or unnecessary
12/13/2012	BH	Printed our MSJ - \$31.80		0		
12/13/2012	BH	Reviewed MSJ and made notes	2.2	0	0	Duplicative or unnecessary
12/23/2012	BH	Printed our Oppo - \$11.70		\$0		
12/23/2012	BH	Reviewed our Oppo	1.2	0	0	Duplicative or unnecessary
12/30/2012	BH	Made additions to Reply	1	0	0	Duplicative or unnecessary
1/16/2013	BH	Reviewed Order re MSJ	0.8	0	0	Duplicative or unnecessary
1/17/2013	BH	Discussed Order with ML, JBS and AK	0.9	0	0	Duplicative or unnecessary

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
3/22/2012	JBS	Discussed potential case with ML and AK	0.8	0	0	Duplicative or unnecessary
3/29/2012	JBS	Saved executed Retainer	0.1	0	0	Duplicative or unnecessary
3/30/2012	JBS	Printing Cost for Complaint – \$2.40			0	
3/30/2012	JBS	Reviewed Complaint	0.5		0	Duplicative or unnecessary
3/30/2012	JBS	Sent Complaint to ML with notes	0.1		0	Duplicative or unnecessary
5/30/2012	JBS	Received Notice re removal from AK	0.1		0	Duplicative or unnecessary
5/30/2012	JBS	Printed Removal documents - \$9.30			0	
5/30/2012	JBS	Reviewed FCO's Answer	0.1		0	Duplicative or unnecessary
5/31/2012	JBS	Reviewed Standing Order	0.5		0	Duplicative or unnecessary
5/31/2012	JBS	Reviewed Scheduling Meeting of Counsel	0.4		0	Duplicative or unnecessary
6/18/2012	JBS	Discussed FCO's position with ML, AK and BH	0.3		0	Duplicative or unnecessary
6/29/2012	JBS	Printed 26f - \$2.40			\$0	
6/30/2012	JBS	Reviewed 26f and sent notes to ML	0.3		0	Duplicative or unnecessary
7/20/2012	JBS	Received 26f Order from AK	0.1		0	Duplicative or unnecessary
7/20/2012	JBS	Printed 26f Order - \$.60			\$0	
7/20/2012	JBS	Received Civil Trial Order and Scheduling Order from AK	0.1		0	Duplicative or unnecessary
10/5/2012	JBS	Drove to Santa Ana to discuss litigation strategy	1.6		0	Duplicative or unnecessary
10/5/2012	JBS	Mileage cost of \$43			\$0	

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
10/5/2012	JBS	Discussed litigation strategy with AK and ML	1.3	0	0	Duplicative or unnecessary
10/5/2012	JBS	Drove to San Diego	1.4	0	0	Duplicative or unnecessary
10/5/2012	JBS	Mileage cost of \$43		\$0		
10/7/2012	JBS	Printed discovery - \$4.50		0		
10/8/2012	JBS	Reviewed AK's changes and made additions	0.3	0	0	Duplicative or unnecessary
12/6/2012	JBS	Discussed filing MSJ with ML and AK	1.4	0	0	Duplicative or unnecessary
12/13/2012	JBS	Printed our MSJ - \$31.80		\$0		
12/14/2012	JBS	Reviewed MSJ and made notes	1.6	0	0	Duplicative or unnecessary
12/15/2012	JBS	Printed their MSJ - \$26.10		\$0		
12/15/2012	JBS	Reviewed FCO's MSJ	0.7	0	0	Duplicative or unnecessary
12/15/2012	JBS	Discussed Decs for PG and ZG with AK and ML	0.6	0	0	Duplicative or unnecessary
12/19/2012	JBS	Reviewed Oppo and sent notes to AK	1.9	0	0	Duplicative or unnecessary
12/22/2012	JBS	Discussed FCO's Oppo with AK and ML	0.5	0	0	Duplicative or unnecessary
12/23/2012	JBS	Printed our Oppo - \$11.70		\$0		
12/23/2012	JBS	Reviewed our Oppo	0.8	0	0	Duplicative or unnecessary
12/27/2012	JBS	Discussed Reply with ML and AK	0.8	0	0	Duplicative or unnecessary
12/30/2012	JBS	Printed Reply - \$5.10		\$0		
12/30/2012	JBS	Made additions to Reply	1.2	0	0	Duplicative or unnecessary
12/31/2012	JBS	Reviewed FCO's Reply	1.8	0	0	Duplicative or unnecessary
12/31/2012	JBS	Printed their Reply - \$8.40		\$0		
1/1/2013	JBS	Discussed FCO's Reply with AK and ML	1	0	0	Duplicative or unnecessary

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
1/3/2013	JBS	Discussed depositions with AK and ML	0.4	0	0	Duplicative or unnecessary
1/15/2013	JBS	Reviewed Order re MSJ	1.1	0	0	Duplicative or unnecessary
1/17/2013	JBS	Discussed Order with ML, BH and AK	0.9	0	0	Duplicative or unnecessary
1/20/2013	JBS	Discussed pretrial docs with AK and ML	1.1	0	0	Duplicative or unnecessary
1/29/2013	JBS	Printed pretrial docs - \$28.20		\$0		
1/29/2013	JBS	Discussed Joint Pretrial docs with AK and ML	0.8	0	0	Duplicative or unnecessary
1/29/2013	JBS	Reviewed Joint Stip and sent notes to ML	0.2	0	0	Duplicative or unnecessary
1/31/2013	JBS	Printed pretrial docs - \$28.20		\$0		
1/31/2013	JBS	Sent notes to ML	0.9	0	0	Duplicative or unnecessary
2/1/2013	JBS	Reviewed pretrial docs	1.1	0	0	Duplicative or unnecessary
2/4/2013	JBS	Discussed Order with AK and ML	0.4	0	0	Duplicative or unnecessary
2/12/2013	JBS	Discussed hearing with AK and ML	0.5	0	0	Duplicative or unnecessary
2/13/2013	JBS	Discussed fee petition with AK and ML	0.7	0	0	Duplicative or unnecessary
3/8/2013	JBS	Discussed Plaintiffs' counter with ML and AK	0.2	0	0	Duplicative or unnecessary
3/8/2013	JBS	Discussed FCO's position on settlement check with AK and ML	0.3	0	0	Duplicative or unnecessary
3/13/2013	JBS	Reviewed Joint Statement and sent notes to ML	0.6	0	0	Duplicative or unnecessary

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
3/22/2012	ML	Performed client intake re Paul and Zuzanna	1.6	1.6	1.6	N/A
3/22/2012	ML	Discussed potential case with AK and JBS	0.8	0	0.8	N/A
3/23/2012	ML	Called PG to inform him of interest in case – no answer	0.1	0	0.1	N/A
3/26/2012	ML	Received call from PG and ZG re case – informed PG that we needed documents prior to filing	0.7	0.4	0.7	N/A
3/27/2012	ML	Received documents from PG	0	0		
3/27/2012	ML	Reviewed documents	1.3	0.6	1	Excessive
3/27/2012	ML	Printing Cost - \$11.70		\$11.70		
3/28/2012	ML	Discussed documents with AK	0.9	0	0	Entry lacks sufficient detail to determine reasonableness
3/28/2012	ML	Called PG with follow-up questions	0.4	0.4	0.4	N/A
3/28/2012	ML	Exchanged e-mails with ZG re Retainer	0.2	0.2	0.2	N/A
3/29/2012	ML	Received executed Retainer from PG/ZG	0.1	0.1	0.1	N/A
3/29/2012	ML	Sent executed Retainer to AK and JBS	0.1	0	0	Clerical or administrative task
3/29/2012	ML	Fax costs - \$5.00 (\$2.50 per copy)		\$0.20		
3/29/2012	ML	Drafted Complaint	1.2	1.2	1.2	N/A
3/29/2012	ML	Sent Complaint to AK to review	0.1	0	0	Clerical or administrative task

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
3/30/2012	ML	Printing Cost for Complaint – \$2.40		\$2.40		
3/30/2012	ML	Made changes to Complaint	0.6	0.6	0.6	N/A
4/2/2012	ML	Sent Complaint to AK for final review	0.1	0	0	Clerical or administrative task
4/17/2012	ML	Received e-mail from PG re status	0.1	0.1	0.1	N/A
4/17/2012	ML	E-mailed PG informing him that process server is in process of filing and serving	0.2	0.2	0.2	n/A
4/23/2012	ML	Spoke with process server – Complaint filed	0.2	0	0	Clerical or administrative task
5/3/2012	ML	Received status inquiry from PG	0.1	0.1	0.1	N/A
5/3/2012	ML	Called process server re status of service	0.2	0	0	Clerical or administrative task
5/3/2012	ML	Returned PG's e-mail with update re service	0.3	0.3	0.3	N/A
5/14/2012	ML	Received call from process server – FCO served	0.2	0	0.2	N/A
5/15/2012	ML	Received e-mail from PG and ZG with BRE Properties, Inc.'s BBB response	0.1	0.1	0.1	N/A
5/15/2012	ML	E-mailed PG and ZG letting them know that I would review in the afternoon	0.1	0.1	0.1	N/A
5/15/2012	ML	Printed BBB Responses - \$4.20		\$4.20		
5/15/2012	ML	Reviewed BBB response	0.4	0.2	0.4	N/A
5/15/2012	ML	Discussed BBB response with AK	0.3	0	0.3	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
5/15/2012	ML	Informed PG and ZG that BBB response from BRE admitted violation	0.4	0.4	0.4	N/A
5/29/2012	ML	Received notice of removal from AK	0.1	0	0.1	N/A
5/29/2012	ML	Printed Removal documents - \$9.30		\$9.30		
5/29/2012	ML	Discussed removal with AK	0.3	0	0.1	Entry lacks sufficient detail to determine reasonableness
5/30/2012	ML	Informed PG and ZG that FCO removed Complaint to Federal Court	0.4	0.4	0.4	N/A
5/30/2012	ML	Received e-mail from PG and ZG re removal	0.1	0.1	0.1	N/A
5/30/2012	ML	Discussed e-mail and response with AK	0.2	0	0.2	N/A
5/30/2012	ML	Responded to removal e-mail from PG and ZG	0.4	0.4	0.4	N/A
5/30/2012	ML	Received and reviewed response from PG and ZG	0.3	0.3	0.3	N/A
5/30/2012	ML	Responded to PG and ZG's e-mail	0.3	0.3	0.3	n/A
5/30/2012	ML	Received and reviewed e-mail from PG and ZG	0.1	0	0.1	N/A
5/30/2012	ML	E-mailed ST to discuss case	0.1	0.1	0.1	N/A
5/31/2012	ML	Discussed case with ST	0.4	0.4	0.4	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
5/31/2012	ML	Reviewed Answer, Notice of Interested Parties, Notice of Parties to Court-Directed ADR Program	0.6	0.2	0.6	N/A
5/31/2012	ML	Printing Costs re Answer, Notice of Interested Parties, Notice of Parties to Court-Directed ADR Program - \$3.30		\$3.30		
5/31/2012	ML	Reviewed Standing Order and calendared dates	1.1	0	0.5	Entry lacks sufficient detail to determine reasonableness; block billing; clerical task
5/31/2012	ML	Printed standing order - \$2.70		\$2.70		
5/31/2012	ML	Printed Scheduling Meeting of Counsel - \$1.80		\$1.80		
5/31/2012	ML	Reviewed Scheduling Meeting of Counsel and calendared dates	0.8	0	0.4	Excessive
6/1/2012	ML	Discussed Standing Order and Scheduling Meeting of Counsel with AK	0.4	0	0.2	Excessive
6/3/2012	ML	Made settlement demand to ST	0.3	0.3	0.3	N/A
6/10/2012	ML	Sent follow up e-mail to ST re settlement demand	0.1	0.1	0.1	N/A
6/18/2012	ML	Received rejection from ST – no counter, informed that Client would bring MSJ by 6/21/12 and request for attorney's fees	0.1	0.1	0.1	N/A
6/18/2012	ML	Informed AK, JBS and BH of FCO's position	0.3	0	0.3	N/A
6/18/2012	ML	Told ST to bring MSJ	0.2	0.2	0.2	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
6/28/2012	ML	Discussed 26f with PG and ZG	0.5	0.5	0.5	N/A
6/28/2012	ML	Prepared 26f – sent to AK to review	1	1	1	N/A
6/29/2012	ML	Made changes to 26f	0.4	0.4	0.4	N/A
6/29/2012	ML	Sent 26f to JBS to review	0.1	0	0	Duplicative or unnecessary
6/29/2012	ML	Printed 26f - \$2.40		\$2.40		
6/30/2012	ML	Made changes to 26f	0.2	0	0.2	N/A
6/30/2012	ML	E-mailed ST to Meet and Confer re 26f	0.1	0.1	0.1	N/A
7/2/2012	ML	Received e-mail from ST re Meet and Confer – informed him that I would prepare 26f	0.3	0.3	0.3	N/A
7/5/2012	ML	Finished 26f	0.2	0.2	0.2	N/A
7/5/2012	ML	Sent 26f to ST to review	0.2	0.1	0.2	N/A
7/6/2012	ML	Received e-mail from ST stating dates are ok but still need FCO's portions	0.3	0.1	0.1	Excessive
7/6/2012	ML	Received FCO's additions	0.1	0.1	0.1	N/A
7/6/2012	ML	Printed 26f - \$2.40		\$2.40		
7/6/2012	ML	Sent 26f to AK for final review	0.1	0	0.1	N/A
7/6/2012	ML	Lodged 26f with Court	0.2	0	0	Clerical or administrative task
7/13/2012	ML	Received e-mail from PG re status	0.1	0.1	0.1	N/A
7/13/2012	ML	Responded to PG	0.2	0.2	0.2	N/A
7/20/2012	ML	Received 26f Order from AK	0.1	0	0.1	N/A
7/20/2012	ML	Printed 26f Order - \$.60		\$0.60		
7/20/2012	ML	Calendared 26f Order dates	0.4	0	0	Clerical or administrative task
7/20/2012	ML	Received Civil Trial Order and Scheduling Order from AK	0.1	0	0.1	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
7/20/2012	ML	Printed Civil Trial Order and Scheduling Order - \$2.70		\$2.70		
7/20/2012	ML	Printed Civil Trial Order and Scheduling Order - \$2.70		\$2.70		
7/20/2012	ML	Calendared Civil Trial Order and Scheduling Order dates	0.6	0	0	Clerical or administrative task
7/20/2012	ML	Explained purpose of 26as and what we needed from PG and ZG for them	0.8	0.3	0.8	N/A
7/23/2012	ML	Prepared Initial Disclosures	1.3	0.6	1.3	N/A
7/23/2012	ML	Sent 26as to AK for review	0.1	0	0.1	N/A
7/24/2012	ML	Made changes to 26a	0.3	0	0.3	N/A
7/25/2012	ML	Discussed 26as with PG and ZG	0.3	0.3	0.3	N/A
7/25/2012	ML	Sent 26as to ST	0.1	0.1	0.1	N/A
7/30/2012	ML	Received e-mail from Kathryn Flora (FCO attorney) re FCO's 26as – informed that we would receive them by August 2, 2012	0.1	0.1	0.1	N/A
7/30/2012	ML	Calendared FCO's 26a date	0.1	0	0	Clerical or administrative task
9/10/2012	ML	Discussed case with AK	0.3	0	0.3	N/A
9/11/2012	ML	Discussed case and settlement options with PG and ZG	0.5	0.5	0.5	N/A
9/12/2012	ML	Discussed case with ST	0.3	0.3	0.3	N/A
9/12/2012	ML	Discussed settlement numbers with AK	0.4	0	0.4	N/A
9/12/2012	ML	Sent settlement demand to ST	0.4	0.2	0.2	Excessive
9/12/2012	ML	Received e-mail from ST	0.1	0.1	0.1	N/A
9/30/2012	ML	PG and ZG requested update re settlement	0.2	0.2	0.2	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
10/1/2012	ML	Sent e-mail to ST re settlement demand	0.1	0.1	0.1	N/A
10/4/2012	ML	Received e-mail from ST saying that he has not heard back from FCO yet	0.1	0.1	0.1	N/A
10/5/2012	ML	Discussed litigation strategy with AK and JBS	1.3	0	0.8	Excessive
10/5/2012	ML	Prepared discovery	2	2	2	N/A
10/6/2012	ML	Sent discovery to AK and JBS to review	0.1	0	0.1	N/A
10/8/2012	ML	Printed discovery - \$4.50		\$4.50		
10/8/2012	ML	Finalized discovery and propounded	0.4	0	0.4	N/A
11/7/2012	ML	Received call from PJ requesting discovery extension	0.3	0.3	0.3	N/A
11/7/2012	ML	Received confirmatory e-mail re discovery extension from PJ	0.1	0.1	0.1	N/A
11/7/2012	ML	Updated calendar re discovery extension	0.1	0	0	Clerical or administrative task
11/15/2012	ML	Followed up with PJ and ST re depo dates	0.1	0.1	0.1	N/A
11/15/2012	ML	Received e-mail from ST saying that ST had not heard back from FCO	0.1	0.1	0.1	N/A
11/15/2012	ML	Received e-mail from PJ saying that PJ had not heard back from FCO	0.1	0.1	0.1	N/A
11/19/2012	ML	Received e-mail from ST requesting another extension	0.1	0.1	0.1	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
11/19/2012	ML	Discussed extension with AK	0.2	0	0.2	N/A
11/19/2012	ML	Granted extension and updated calendars	0.3	0.1	0.1	Clerical or administrative task
12/3/2012	ML	Received discovery responses from FCO	0.1	0.1	0.1	N/A
12/3/2012	ML	Reviewed discovery responses from FCO	2.3	1.2	1.5	Entry lacks sufficient detail to determine reasonableness
12/3/2012	ML	Discussed discovery with AK	0.5	0	0.5	N/A
12/3/2012	ML	Requested depo dates from PG and ZG – discussed why FCO wanted depo and why depo needed to happen quickly	0.8	0.4	0.4	Excessive; entry lacks sufficient detail to determine reasonableness
12/3/2012	ML	Received dates from PG and ZG	0.1	0.1	0.1	N/A
12/5/2012	ML	Discussed FCO's discovery responses with PG and ZG	1.1	1.1	1.1	N/A
12/6/2012	ML	Discussed filing MSJ with AK and JBS	1.4	0	1	Excessive
12/7/2012	ML	Discussed filing MSJ with PG and ZG	1.2	0	1.2	N/A
12/8/2012	ML	Researched MSJ	2.1	0	2.1	N/A
12/14/2012	ML	FCO filed MSJ	0.1	0.1	0.1	N/A
12/14/2012	ML	Printed their MSJ - \$26.10		\$26.10		
12/14/2012	ML	Reviewed FCO's MSJ	2	2	2	N/A
12/15/2012	ML	Researched FCO's case law	2.1	1	2.1	N/A
12/15/2012	ML	Printed our MSJ - \$31.80		\$0		
12/15/2012	ML	Reviewed our MSJ and made additions	2.6	0	2.6	N/A
12/15/2012	ML	Began MSJ Declarations for PG and ZG	0.9	0.9	0.9	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
12/15/2012	ML	Discussed Decs for PG and ZG with AK and JBS	0.6	0	0.6	N/A
12/16/2012	ML	Finalized Decs	0.3	0.3	0.3	N/A
12/16/2012	ML	Sent decs to PG and ZG	0.1	0.1	0.1	N/A
12/17/2012	ML	Received signed decs	0.1	0.1	0.1	N/A
12/17/2012	ML	Reviewed FCO's supplemental responses	1.7	0.5	1.7	N/A
12/20/2012	ML	Assisted AK with Oppo	3.1	0	1	Entry lacks sufficient detail to determine reasonableness
12/21/2012	ML	FCO filed Oppo to our MSJ – read and prepared Reply	2.1	0	2.1	N/A
12/21/2012	ML	Printed their Oppo - \$23.40		\$0		
12/22/2012	ML	Discussed FCO's Oppo with AK and JBS	0.5	0	0.5	N/A
12/23/2012	ML	Researched FCO's Oppo	2.7	0	2	Excessive
12/23/2012	ML	Prepared Oppo to be filed	1.1	0	0	Clerical or administrative task
12/24/2012	ML	Began drafting Reply	2.1	0	2.1	N/A
12/24/2012	ML	Sent draft of Reply to AK	0.2	0	0.1	Excessive
12/27/2012	ML	Discussed Reply with AK and JBS	0.8	0	0.4	Excessive
12/30/2012	ML	Printed Reply - \$5.10		\$0		
12/30/2012	ML	Made notes on Reply	0.6	0	0.2	Excessive
12/30/2012	ML	Printed Reply - \$5.10				
12/30/2012	ML	Confirmed Jan 2 depo with PG and ZG	0.2	0.2	0.2	N/A
12/30/2012	ML	Prepared PG and ZG for depo	2.2	2.2	2.2	N/A
12/31/2012	ML	Organized documents for depo	1.9	0	0.4	Excessive
12/31/2012	ML	FCO filed their Reply	0.1	0.1	0.1	N/A
12/31/2012	ML	Reviewed FCO's Reply	1.7	1.7	1.7	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
12/31/2012	ML	Printed their Reply - \$8.40		\$8.40		
1/1/2013	ML	Discussed FCO's Reply with AK and JBS	1	0	0.5	Excessive
1/2/2013	ML	Defended depositions re PG and ZG	8.4	0	0	Excessive; unnecessary
1/2/2013	ML	Mileage \$14.85		\$14.85		
1/3/2013	ML	Discussed depositions with JBS and AK	0.4	0	0	Duplicative or unnecessary
1/3/2013	ML	Received and reviewed Notice of Deficiencies re our MSJ	0.2	0	0.1	Excessive
1/17/2013	ML	Discussed Order with AK, JBS and BH	0.9	0	0.4	Excessive
1/17/2013	ML	Discussed meaning of Order with PG and ZG	1.2	1.2	1.2	N/A
1/20/2013	ML	Discussed pretrial docs with AK and JBS	1.1	0	0.4	Entry lacks sufficient detail to determine reasonableness
1/21/2013	ML	Worked on pretrial docs	2.1	2.1	2.1	N/A
1/21/2013	ML	Printed pretrial docs - \$28.20		\$28.20		
1/29/2013	ML	Discussed Joint Pretrial docs with AK and JBS	0.8	0	0	Duplicative or unnecessary
1/29/2013	ML	Sent e-mail to ST and PJ re Joint Pretrial docs	0.2	0.2	0.2	N/A
1/29/2013	ML	Discussed mediation with ST and PJ	0.4	0.4	0.4	N/A
1/29/2013	ML	Told AK that FCO is interested in mediation	0.2	0	0.1	Excessive
1/29/2013	ML	Prepared Joint Stip to continue dates	0.7	0.7	0.7	N/A
1/29/2013	ML	Sent Joint Stip to AK and JBS for review	0.1	0	0.1	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
1/29/2013	ML	Made changes to Joint Stip	0.2	0	0.2	N/A
1/29/2013	ML	Sent Joint Stip to PJ for review	0.1	0.1	0.1	N/A
1/30/2013	ML	Received approval from PJ to file joint stip	0.1	0.1	0.1	N/A
1/30/2013	ML	Filed Joint Stip	0.4	0	0	Clerical or administrative task
1/30/2013	ML	Worked on Pretrial docs	5.7	4	4	Excessive
1/31/2013	ML	Sent pretrial docs to AK and JBS to review	0.1	0	0.1	N/A
1/31/2013	ML	Incorporated notes from AK and JBS	2.1	0	1.1	Excessive
1/31/2013	ML	Received denial of Joint Stip	0.1	0.1	0.1	N/A
1/31/2013	ML	Sent e-mail to PJ re denial	0.3	0.1	0.1	Excessive
1/31/2013	ML	Continued working on pre-trial docs	4	2	2	Excessive
1/31/2013	ML	Spoke with PJ and DS re docs	0.7	0.7	0.7	N/A
1/31/2013	ML	Finished pretrial docs	2.8	1.5	1.4	Excessive
2/1/2013	ML	Sent pretrial docs to AK and JBS to review	0.1	0	0.1	N/A
2/1/2013	ML	Incorporated notes of AK and JBS for pretrial docs	0.9	0.9	0.9	N/A
2/1/2013	ML	Requested that PJ and DS finish pretrial exhibit list	0.3	0.1	0.1	Excessive
2/1/2013	ML	Called PG and discussed settlement	0.4	0.4	0.4	N/A
2/1/2013	ML	Called AK and gave him PG and ZG's approval to settle	0.2	0	0.1	Excessive
2/1/2013	ML	Approved Notice of Settlement that was prepared by FCO	0.2	0.2	0.2	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
2/4/2013	ML	Received Order from Chambers re settlement	0.1	0.1	0.1	N/A
2/4/2013	ML	Discussed Order with AK and JBS	0.4	0	0.2	Excessive
2/7/2013	ML	Sent e-mail to PJ re putting settlement on record	0.1	0.1	0.1	N/A
2/7/2013	ML	Spoke with PJ on phone re putting settlement on record	0.2	0.2	0.2	N/A
2/8/2013	ML	Spoke with DS re putting settlement on record	0.3	0.3	0.3	N/A
2/8/2013	ML	Received call from Chambers re putting settlement on record	0.2	0.2	0.2	N/A
2/8/2013	ML	Called PG and ZG re hearing on 2/12/13	0.8	0.8	0.8	N/A
2/8/2013	ML	Confirmed with AK that PG and ZG knew to appear telephonically at hearing	0.1	0	0.1	N/A
2/10/2013	ML	Discussed call in for putting settlement on record with AK	0.3	0	0.1	Excessive
2/10/2013	ML	Discussed call in for putting settlement on record with ML	0.3	0	0.1	Excessive
2/12/2013	ML	Prepared PG for hearing	0.4	0.4	0.4	N/A
2/12/2013	ML	Participated in settlement hearing	0.8	0.5	0.5	Excessive
2/12/2013	ML	Discussed hearing with PG and ZG	0.3	0.3	0.3	N/A
2/12/2013	ML	Discussed hearing with AK and JBS	0.5	0	0.2	Excessive
2/13/2013	ML	Received Briefing Schedule from Chambers	0.1	0.1	0.1	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
2/13/2013	ML	Calendared dates for briefing schedule	0.4	0	0	Clerical or administrative task
2/13/2013	ML	Discussed fee petition with AK and JBS	0.7	0	0.7	N/A
2/15/2013	ML	Worked on fee petition	1.1	1.1	1.1	N/A
2/17/2013	ML	Began Joint Statement re Fee Petition	2.6	2.6	2.6	N/A
3/8/2013	ML	Discussed Plaintiffs' counter with AK and JBS	0.2	0	0.2	N/A
3/8/2013	ML	Received e-mail from PJ and DS re completion of Joint Statement	0.1	0.1	0.1	N/A
3/8/2013	ML	Reviewed Joint Statement and responded to PJ/DS' e-mail	0.4	0.4	0.4	N/A
3/8/2013	ML	Responded to PJ and DS via e-mail	0.3	0.3	0.3	N/A
3/8/2013	ML	Received call from DS re issue with settlement check	0.4	0.4	0.4	N/A
3/8/2013	ML	Discussed FCO's position on settlement check with AK and JBS	0.3	0	0.2	Excessive
3/11/2013	ML	Responded to DS' e-mail regarding the settlement check and explaining Plaintiffs' position	0.2	0.2	0.2	N/A
3/11/2013	ML	Received response from DS re FCO's position	0.1	0.1	0.1	N/A
3/11/2013	ML	Informed DS that Plaintiffs are unable to comply with DS' request	0.2	0.2	0.2	N/A

Joint Statement re Attorneys' Fees with Court's Reductions

Date	Billor	Description	Movant's Hours Sought	Respondent's Proposed Hours	Hours Awarded by Court	Reasons for Reduction
3/11/2013	ML	Received FCO's portion of the Joint Statement from DS	0.1	0.1	0.1	N/A
3/12/2013	ML	Researched current case law for Fee Petition	0.9	?	0.9	N/A
3/12/2013	ML	Sent case law research to AK to be incorporated into Fee Petition	0.2	0	0.2	N/A
3/13/2013	ML	Updated Joint Statement with Movants' position	3.2	3.2	3.2	N/A
3/13/2013	ML	Sent updated Joint Statement to JBS and AK for review	0.1	0	0.1	N/A
3/13/2013	ML	Reviewed notes re JBS and AK – incorporated changes	0.5	0	0.5	N/A
3/14/2013	ML	Continued Joint Statement	4.1	3	3	Excessive
3/15/2013	ML	Sent Joint Statement to PJ and DS	0.1	0.1	0.1	N/A

95.195.1 hrs * \$185/hr **\$17,593.50**Total (AK + ML)= **\$34,033.50**